

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

DECLARATION OF SETH A. GOLDBERG

I, Seth A. Goldberg, of full age, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, a Partner with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Prinston Pharmaceutical Inc. (“Prinston”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”, and collectively with ZHP, Prinston, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the ZHP Parties’ Brief in Opposition to Plaintiffs’ Motion for Rule 37 Sanctions.

3. Attached to this Declaration as **Attachment A** is a true and correct copy of excerpts from the deposition of Jucai Ge, dated April 30, 2021.

4. Attached to this Declaration as **Exhibit B** is a true and correct copy of the letter from Jessica Priselac to Adam Slater dated January 19, 2022.

5. Attached to this Declaration as **Exhibit C** is a true and correct copy of the email from Adam Slater to Jessica Priselac dated January 20, 2022.

6. A true and correct copy of excerpts from the Expert Report of Dr. Stephen Lagana, M.D. served in MDL 2875 is attached to this Declaration as **Exhibit D**.

7. A true and correct copy of excerpts from the Expert Report of Dr. Stephen Hecht, PhD, dated July 6, 2021, served in MDL 2875 is attached to this Declaration as **Exhibit E**.

8. A true and correct copy of excerpts from the Expert Report of John L. Quick dated Nov. 7, 2021, served in MDL 2875 is attached to this Declaration as **Exhibit F**.

I hereby certify that the aforementioned statements made by me are true. I am aware that if any of the aforementioned statements made by me are willfully false, I am subject to punishment.

February 2, 2022

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, Esq.
*Lead Counsel and Liaison
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